

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

ANDREW PERRONG, individually and on behalf of all others similarly situated,	:	Civil File No. 22-cv-23
Plaintiff,	:	
	:	
	:	
	:	
v.	:	
	:	
PERS GROUP LLC and STATEWIDE MONITORING CORP.	:	
	:	
Defendants.	:	

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**PLAINTIFF'S RESPONSE TO SHOW CAUSE**

COMES NOW Plaintiff, who files the following response to the Court's July 13, 2022 Order to Show Cause. In response, the Plaintiff apologizes for not moving for a request of default at a more expeditious pace. However, the sole defendant who has not appeared, PERS Group LLC, has repeatedly indicated, through counsel, to counsel for the Plaintiff that they were aware of the case. As recently as last week, counsel for PERS Group LLC indicated that it intended to file an Answer by July 15, 2022. That did not occur, and the Plaintiff has moved for a Clerk's Entry of Default (ECF No. 26).

Dated: July 18, 2022

PLAINTIFF,  
By his attorney,

/s/ Anthony I. Paronich  
Anthony I. Paronich  
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*Pro Hac Vice*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served on this July 18, 2022 on all counsel of record via the Court's CM/ECF system and a copy sent to counsel for the Defendants that are subject to the potential default.

/s/ Anthony I. Paronich